



| <b>Return</b>  |                                 |  |
|--|---------------------------------|--|
| Case No.:  | Date and time warrant executed: | Copy of warrant and inventory left with: |
| Inventory made in the presence of :  |                                 |  |
| Inventory of the property taken and name(s) of any person(s) seized:   |                                 |  |
| <b>Certification</b>   |                                 |  |
| <p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p><br><div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div> |                                 |  |

## ATTACHMENT A

### **Property to Be Searched**

This warrant applies to information between July 1, 2020 and February 1, 2022 associated with the following Instagram pages:

- Instagram page under the URL: [https://www.instagram.com/10436\\_lilmeech/](https://www.instagram.com/10436_lilmeech/)
- Username: 10436\_lilmeech
- Instagram Numeric ID: 4237363028
- Instagram page under the URL: <https://www.instagram.com/goldhuncho/>
- Username: goldhuncho
- Instagram Numeric ID: 31578210968
- Instagram page under the URL: [https://www.instagram.com/bip\\_rickthang/](https://www.instagram.com/bip_rickthang/)
- Username: bip\_rickthang
- Instagram Numeric ID: 688962991
- Instagram page under the URL: [https://www.instagram.com/\\_sngyak/](https://www.instagram.com/_sngyak/)
- Username: \_sngyak
- Instagram Numeric ID: 46758519368
- Instagram page under the URL: <https://www.instagram.com/longliveloski4/>
- Username: longliveloski4
- Instagram Numeric ID: 461083634
- Instagram page under the URL: <https://www.instagram.com/marc0brickz/>
- Username: marc0brickz
- Instagram Numeric ID: 9678460696
- Instagram page under the URL: <https://www.instagram.com/yay.thebarber/>

- Username: yay.thebarber
- Instagram Numeric ID: 232906659

that are stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Instagram**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Meta, Meta is required to disclose the following information to the government for each account or identifier listed in Attachment A:

A. All business records and subscriber information, in any form kept, pertaining to the Account, including:

- a. Identity and contact information (past and current), including full name, e-mail addresses, physical address, date of birth, phone numbers, gender, hometown, occupation, websites, and other personal identifiers;
- b. All Instagram usernames (past and current) and the date and time each username was active, all associated Instagram and Facebook accounts (including those linked by machine cookie), and all records or other information about connections with Facebook, third-party websites, and mobile apps (whether active, expired, or removed);
- c. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;

- d. Devices used to login to or access the account, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;
  - e. All advertising information, including advertising IDs, ad activity, and ad topic preferences;
  - f. Internet Protocol ("IP") addresses used to create, login, and use the account, including associated dates, times, and port numbers, from July 1, 2020 to February 1, 2022;
  - g. Privacy and account settings, including change history; and
  - h. Communications between Meta and any person regarding the account, including contacts with support services and records of actions taken;
- B. All content (whether created, uploaded, or shared by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), images, stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from July 1, 2020 to February 1, 2022;
- C. All content, records, and other information relating to communications sent from or received by the Account from July 1, 2020 to February 1, 2022, including but not limited to:
- a. The content of all communications sent from or received by the Account, including direct and group messages, and all associated

multimedia and metadata, including deleted and draft content if available;

- b. All records and other information about direct, group, and disappearing messages sent from or received by the Account, including dates and times, methods, sources and destinations (including usernames and account numbers), and status (such as delivered, opened, replayed, screenshot);
- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants (including usernames, account numbers, and date and time of entry and exit); and
- d. All associated logs and metadata;

D. All content, records, and other information relating to all other interactions between the Account and other Instagram users from July 1, 2020 to February 1, 2022, including but not limited to:

- a. Interactions by other Instagram users with the Account or its content, including posts, comments, likes, tags, follows (including unfollows, approved and denied follow requests, and blocks and unblocks), shares, invitations, and mentions;
- b. All users the account has followed (including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed,

blocked, unblocked, muted, restricted, or denied a request to follow the account;

c. All contacts and related sync information; and

d. All associated logs and metadata;

E. All records of searches performed by the account from July 1, 2020 to February 1, 2022; and

F. All location information, including location history, login activity, information geotags, and related metadata from July 1, 2020 to February 1, 2022.

Meta is hereby ordered to disclose the above information to the government within 14 DAYS of issuance of this warrant.

## **II. Information to be seized by the government**

1. All information described above that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C §§ 371 (conspiracy), 922(g)(1) (felon in possession of a firearm), and 1343 (wire fraud), those violations involving Demetrius J. Exum, Terry T. Dean, Marcus Malbro, Deautris Q. Mattison, Keorie Smith, Chazz D. White, and Quevon J. McKinnie, and occurring after July 1, 2020, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

a. Possession of a firearm by Demetrius J. Exum and Quevon J. McKinnie; evidence pertaining to schemes to defraud the government by the submission of fraudulent applications for unemployment relief through



the use of the identities of themselves or others including preparatory steps taken, use of the proceeds, and the recruitment of individuals whose identities would be used to further the fraudulent schemes;

- b. Evidence indicating how and when the account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crimes under investigation and to the account owners;
- c. Evidence indicating the account owner's state of mind as it relates to the crimes under investigation;
- d. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- e. The identity of the person(s) who communicated with the user IDs about matters relating to fraudulent schemes to obtain unemployment benefits, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Information regarding seven Instagram  
accounts, more fully described in Attachment A.

Case No. 22-803M(NJ)

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.


The search is related to a violation of:

| <i>Code Section</i>                         | <i>Offense Description</i>                      |
|---|---|
| 18 U.S.C. Sections 371, 922<br>(g)(1), 1343 | Conspiracy, felon in possession, and wire fraud |

The application is based on these facts:

See Attached Affidavit

- ☐ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

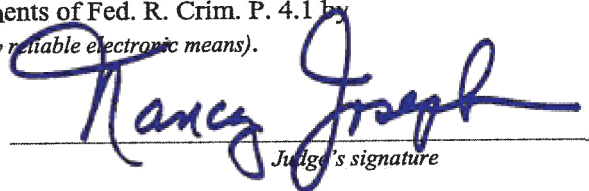
Kristian P. Perales, FBI Task Force Officer

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone \_\_\_\_\_ (specify reliable electronic means).

Date: 2/3/2022

City and state: Milwaukee, WI

  
Judge's signature

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Kristian P. Perales, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with certain Instagram accounts that are stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. ("Meta"), an electronic communications service and/or remote computing service provider headquartered at 1601 Willow Road in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Meta to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I have been working as a Trooper for the Wisconsin State Patrol since March of 2000. I am currently a Master Trooper and is assigned as a Task Force Officer (TFO) to the FBI Milwaukee Area Safe Streets Task Force. In August, 2000 I graduated from the Wisconsin State Patrol Academy. As an FBI TFO, I have conducted numerous investigations of unlawful drug

distribution, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846. As part of these investigations, I have conducted or participated in electronic and physical surveillance, surveillance of confidential informants, the introduction of confidential informants, the execution of search warrants, debriefings of cooperating sources, and reviews of taped conversations and drug records. Through my training, education, and experience, I became familiar with the manner in which illegal drugs are transported, stored, and distributed, and the methods of payment for such drugs. In addition, I have conducted follow-up investigations concerning the concealment of assets, money, and bank records, and the identification of co-conspirators through the use of ledgers, telephone bills and records, photographs, and bank checks, all as related to drug trafficking.

3. I have participated in investigations involving the interception of communications made via wire and electronic communication devices, and am familiar with the ways in which drug traffickers conduct their business, including, but not limited to: their methods of importing and distributing drugs; their use of cellular telephones and digital display paging devices; and their use of numerical codes and code words to conduct their transactions. I have also reviewed and interpreted hundreds of conversations related to the distribution of heroin, cocaine, and other controlled substances.

4. This affidavit is based upon my personal knowledge and upon information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable.

5. Throughout this affidavit, reference will be made to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom I have had regular contact regarding this investigation.

6. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

7. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 371 (conspiracy), 922(g)(1) (felon in possession), and 1343 (wire fraud) have been committed by Demetrius J. Exum (dob: 02/14/2001), Terry T. Dean (dob: 08-31-1993), Marcus Malbro (dob: 09-14-1994), Deautris Q. Mattison (dob: 11-17-1996), Keorie Smith (dob: 1-16-1996), Chazz D. White (dob: 11-14-1990) and Quevon J. McKinnie (dob: 04-12-1998). There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, and/or fruits of these crimes further described in Attachment B.

#### **TARGET ACCOUNTS TO BE SEARCHED**

- URL: [https://www.instagram.com/10436\\_lilmeech/](https://www.instagram.com/10436_lilmeech/)
- Username: 10436\_lilmeech
- Instagram Numeric ID: 4237363028
- Instagram page under the URL: <https://www.instagram.com/goldhuncho/>
- Username: goldhuncho
- Instagram Numeric ID: 31578210968

- Instagram page under the URL: [https://www.instagram.com/bip\\_rickthang/](https://www.instagram.com/bip_rickthang/)
- Username: bip\_rickthang
- Instagram Numeric ID: 688962991
- Instagram page under the URL: [https://www.instagram.com/\\_sngyak/](https://www.instagram.com/_sngyak/)
- Username: \_sngyak
- Instagram Numeric ID: 46758519368
- Instagram page under the URL: <https://www.instagram.com/longliveloski4/>
- Username: longliveloski4
- Instagram Numeric ID: 461083634
- Instagram page under the URL: <https://www.instagram.com/marc0brickz/>
- Username: marc0brickz
- Instagram Numeric ID: 9678460696
- Instagram page under the URL: <https://www.instagram.com/yay.thebarber/>
- Username: yay.thebarber
- Instagram Numeric ID: 232906659

### **JURISDICTION**

8. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court a district court of the United States that has jurisdiction over the offense being investigated. 18 U.S.C. § 2711(3)(A)(i).

### **PROBABLE CAUSE**

9. Since June of 2020, case agents with the Federal Bureau of Investigation (FBI) in coordination with the Milwaukee Police Department (MPD) and the Bureau of

Alcohol, Tobacco, Firearms and Explosives (ATF), have been investigating identified members of the violent street gang, Wild 100s, aka, Shark Gang for federal firearms offenses, drug offenses, and fraud offenses.

10. Based upon a review of MPD reports, information provided by confidential sources, and reviews of publicly available social media posts, beginning in approximately July of 2020, members of the Wild 100s, aka Shark Gang, became involved in an ongoing feud with members of the Ghetto Boys Clique (GBC), aka Swindle Gang. Since that time, multiple homicides, shootings, and instances of illegal possession and transfer of firearms, including the possession of fully automatic firearms, that is, machineguns, have occurred and are suspected to be associated with the ongoing gang feud.

11. On January 26, 2019, a shooting occurred in the area of 2461 N. 33<sup>rd</sup> Street in Milwaukee, WI. The shooting resulted in the homicide of Lawrence "Lowski" HAMILTON, a known Wild 100s member who sustained multiple gunshot wounds. Sometime after the funeral, the grave of Lawrence HAMILTON was desecrated by members of the GBC or Swindle Gang. I know that the grave and memorial desecration is a common way to disrespect a rival gang member and the gang itself. In a later shooting incident, Wild 100s gang member, Ramon SAVAGE confirmed to interviewing MPD officers that the desecration of HAMILTON's grave and memorial is what started the violent feud between the Wild 100s and GBC.

12. Since July of 2020, case agents have identified at least 20 separate incidents of firearms violence and illegal firearms possession linked to the ongoing war between Wild 100s and GBC.



### **COVID-19 Unemployment Fraud**

13. Case agents have also learned from multiple sources, including posts by Wild 100s members on social media, that the Wild 100's are engaged in multiple schemes to defraud unemployment insurance and COVID-19 relief programs. For example, I have seen posts and videos on social media where Wild 100's members use the State of California Employment Development Department (EDD) to file fictitious unemployment claims in others' names. They will access the site, file a claim utilizing someone's date of birth, social security number, and phone number to file the claim. Most individuals will split the profits with the person for whom they are falsely filing the claim. Once the claim is approved, the individual committing the fraud will log into EDD and change the mailing address for the loaded debit card to be sent to a Milwaukee address. The individual will then withdraw the money from these loaded debit cards from an ATM and split the profits with the individual for whom they are filing the false claim.

14. I am aware that on March 13, 2020, the President of the United States declared COVID-19 an emergency under the Robert T. Stafford Disaster Relief and Emergency Assistance Act. As a result, Congress passed the Coronavirus Aid, Relief, and Economic Security Act ("CARES ACT"), which was signed into law by the President on March 27, 2020. The CARES act provides over \$2 trillion in economic relief protections to the American people from the public health and economic impacts of COVID-19.

15. Since 1935, the U.S. Department of Labor's Unemployment Insurance (UI) program has provided unemployment benefits to eligible workers who become



unemployed through no fault of their own. This program ensures that at least a significant part of necessary living expenses are provided on a weekly basis while the worker seeks employment. Unemployment insurance beneficiaries who meet the requirements of the applicable state law are eligible for this temporary financial assistance. Each state administers a separate UI program within the guidelines established by federal law.

16. The CARES Act established a new program—Pandemic Unemployment Assistance (PUA)—to provide unemployment benefits during the COVID-19 pandemic to people who do not qualify for regular unemployment insurance benefits including business owners, self-employed workers, independent contractors, and those with a limited work history who are out of business or have significantly reduced their services as a direct result of the pandemic. Unemployment insurance benefits provided under the PUA program are sometimes referred to as PUA benefits. Each state's unemployment insurance office is responsible for distributing these benefits if available in that state.

**Demitrius Exum (lilmeech)**

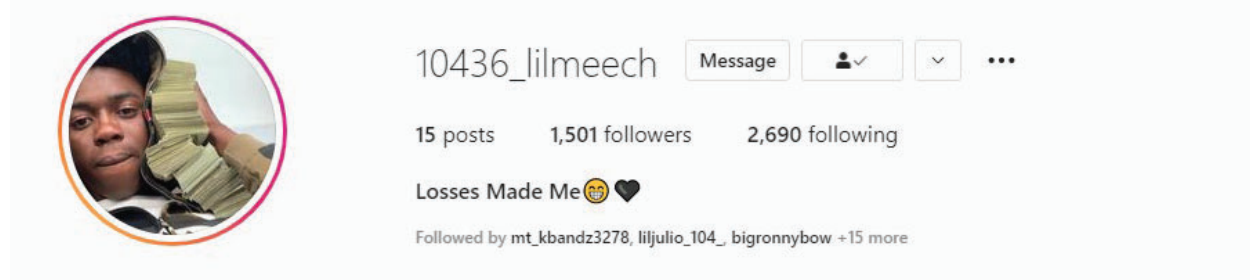
17. In April of 2021, case agents located an Instagram page under the name URL [https://www.instagram.com/10436\\_lilmeech/](https://www.instagram.com/10436_lilmeech/), Username 10436\_lilmeech, Instagram numeric ID: 4237363028. Case agents obtained and compared a Wisconsin Driver's License photograph of Demitrius J. Exum (dob 01/14/2001) to the photos on the publicly viewable portion of the aforementioned Instagram page. Case agents have compared known photographs of Exum to the "selfies" posted by the person utilizing

the 10436\_lilmeech Instagram page. Based on the photograph comparisons, case agents believe that EXUM is the user.

18. Case agents reviewed the criminal history of Demetrius J. Exum. He was found delinquent of the felony crime of Robbery with Threat of Force (943.32 (1)(b)). He is prohibited from possessing firearms after being adjudicated delinquent of a felony.

19. Case agents reviewed the publicly viewable posts on the 10436\_lilmeech Instagram page and found photographs of EXUM with what appear to be firearms.

20. As of September 11, 2021, EXUM posted a photograph of himself for the 10436\_lilmeech Instagram page, utilized by EXUM, and included the description on his photograph “Wild Hunnits”, and a photograph of EXUM holding what appears to be a pistol. Case agents believe that EXUM is identifying himself as a member of the Wild 100s street gang. Screen shots are set forth below.



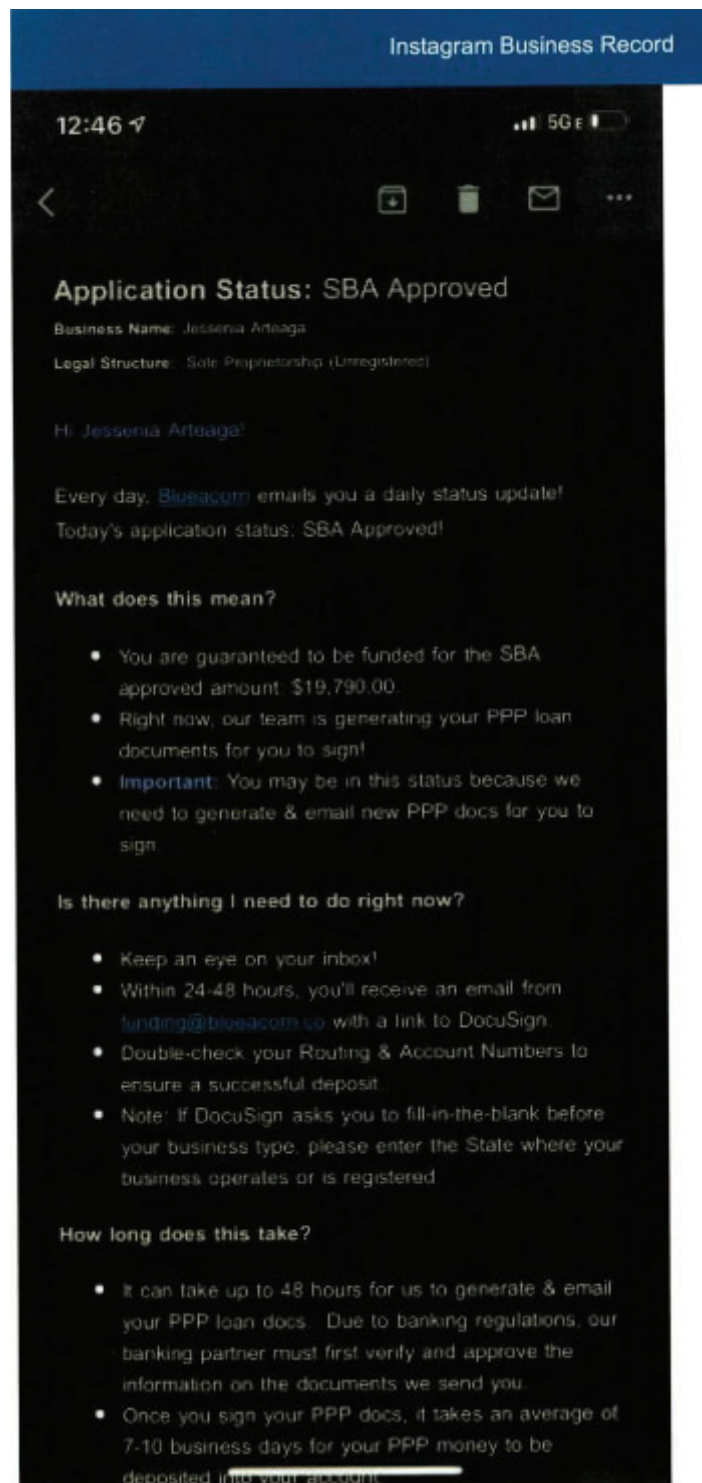


### **Terry T. Dean (longliveloski4)**

21. In April, 2021, the longliveloski4 Instagram account posted a publicly viewable video clip of Terry T. Dean 08-31-1993 with what appears to be a large amount of U.S. Currency. Longliveloski4 includes the description of “Shark Gang” in the comment section. The caption reads, “Shark Gang New Video Dropping#WestSide”. Agents know Dean to use this Instagram account as they have compared his photographs on Instagram to a Wisconsin Dept. of Transportation Driver License photograph, it is the same person. Case agents know the “Shark Gang” criminal organization to be also known as the “Wild 100’s” criminal organization. Agent’s have reviewed the Instagram warrant return of ato\_poppy. The user of Instagram ato\_poppy has been identified as Vernell Hamilton. On 04-09-2021 at 21:29:37 UTC time, there is a conversation between longliveloski4 and ato\_poppy regarding unemployment fraud.

Longliveloski4 sent a screen shot to ato\_poppy that showed the status of an SBA application filed under the name of "Jessenia Arteaga". During the conversation, ato\_poppy tells longliveloski4 that two of his cards came. Longliveloski4 asks how much are on the cards, ato\_poppy advises 2200.00. Ato\_poppy stated that he did them before he knew what backdate to use. In addition, longliveloski4 advised ato\_poppy that he had done 7 already and that his first one had been approved today. Then longliveloski4 sent the photograph of the SBA loan. The conversation continues with ato\_poppy telling longliveloski4 that he only has done his sister and he is trying to see if it goes through. Ato\_poppy tells longliveloski4 that he is only doing family or people that he knows personally. Paragraph #22 is a screen shot of the SBA application status that is approved. The second photograph in paragraph #22 shows Terry Dean with large amounts of what appears to be U.S. Currency.

22.







### **Marcus Malbro (marc0brickz)**

23. In September 2021, the marc0brickz Instagram account which is linked with Marcus Malbro 09-14-1994 posted a publicly viewable photograph of himself, which is of Malbro and a toddler.<sup>1</sup> Agents have compared the photographs that Malbro posted on the Instagram account to the Texas Dept. of Transportation Driver License photo and it is the same person. Marc0brickz posted a comment on the photograph which reads “2 much gossip not enough profit#MOTION”. Along with the post were some emojis which consist of an unknown animal, a shark, and four leaf clover. Agents believe that the shark emoji is Malbro identifying himself as a member of the “Shark Gang” criminal organization. Teshae Hanna 09-23-1999 was an active Shark Gang/Wild 100’s criminal organization member. Additionally, after a search warrant

<sup>1</sup> In the past few weeks, Malbro has taken down all of his photos from his public page.

review of Teshae Hanna's cellular telephone, it shows Instagram conversations between marc0brickz and \_teshae. On 01-07-2021 at 21:20:56 UTC, there is a conversation between marc0brickz and \_teshae. \_teshae sent marc0brickz a screen shots of application confirmation from the State of California Employment Development Department under the name of Katherine Heldt. The photograph of paragraph #24 is of Marcus Malbro. Paragraph #25 is a photograph sent to marc0brickz from \_teshae, it shows a response from the California Employment Development Department with a summary of transactions on the unemployment account. Paragraph #26 is a picture from \_teshae sent to marc0brickz showing a confirmation from the California Employment Development Department that an application has been successfully submitted under the name Katherine Heldt.

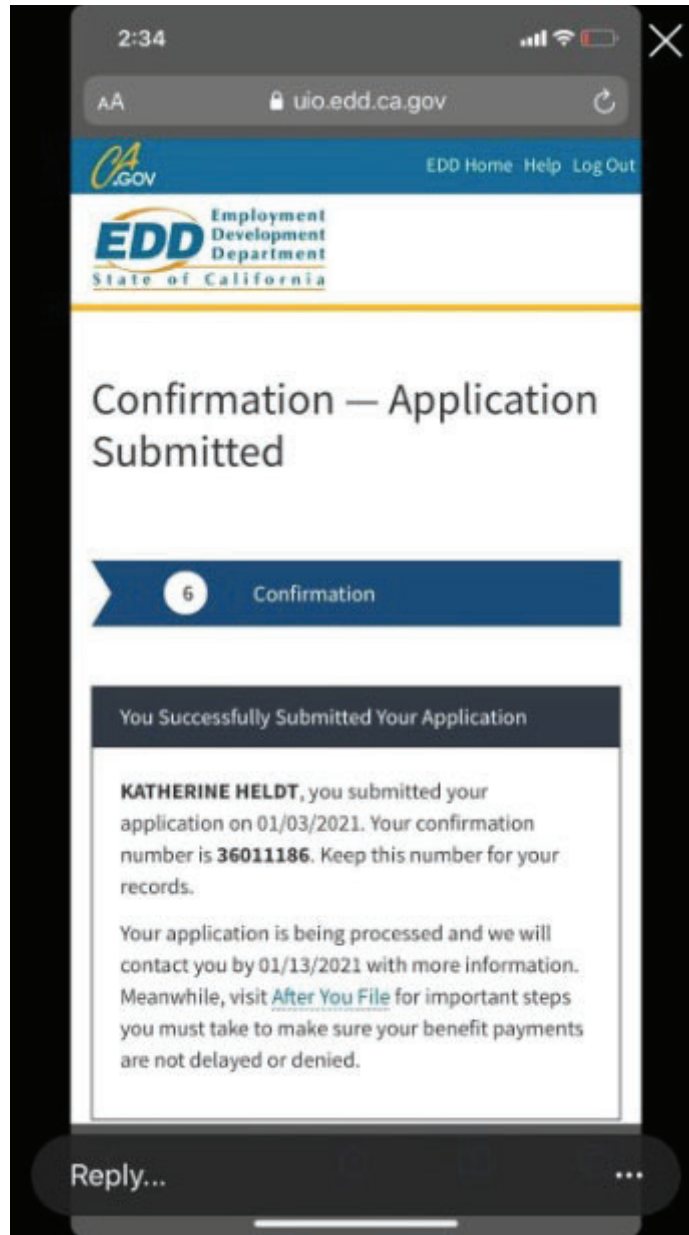
24.





25.





26.

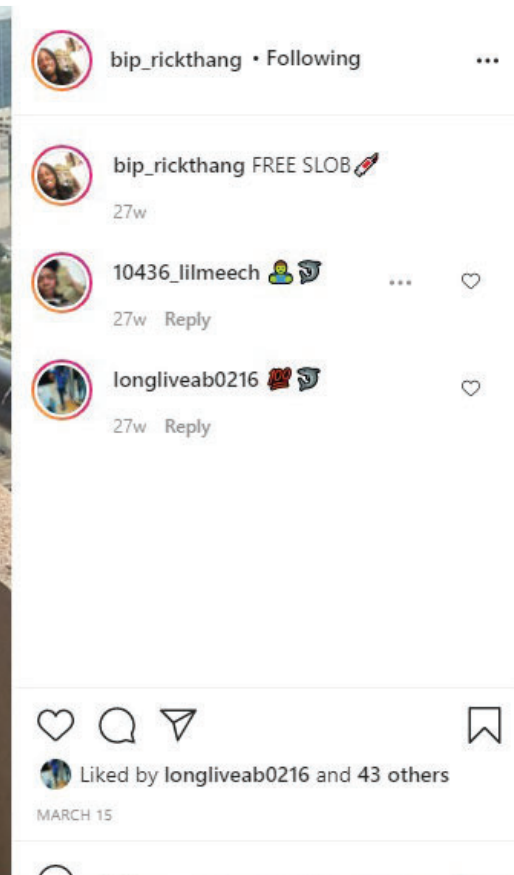
**Deautris Q. Mattison (bip\_rickthang)**

27. In March 2021, bip\_rickthang Instagram account utilized by Deautris Q. Mattison 11-17-1996 posted a photograph of himself with another male and in the comment section. Agents have observed the “selfies” Mattison posted on Instagram and have compared them to the Wisconsin Dept. of Transportation Driver License photo, and they are the same person. Another Instagram user with the username of

10436\_lilmeech posted emojis of a person and a shark. Case agents believe that EXUM is identifying Mattison as a member of the "Shark Gang" criminal organization. Additionally, a search warrant review was done on Teshae Hanna's cellular telephone. The cellular phone review reveals conversations on Instagram between bip\_rickthang and \_teshae. Some of the conversations include unemployment fraud against the State of California including claim filing, the screen shots are set forth below. The unemployment fraud entails filing claims under other people's names, falsifying employment information, and making back-dated claims. This network of subjects communicate on Instagram and when one has a question regarding filing fraudulent claims, that person will contact another person for guidance on how to complete the task.

28. On 12-21-2020, there was a conversation between bip\_rickthang and \_teshae, in which \_teshae sent bip\_rickthang a picture of the California EDD website to create a new account. Bip\_rickthang sent a picture back to \_teshae showing that he was making a fraudulent claim by claiming to work and live in San Diego County, CA. Bip\_rickthang continued to send pictures to \_teshae of the application of fraudulent information by claiming to be unemployed/Self-employed individual. Bip\_rickthang continued to send \_teshae screenshots of the application pages, including entering a San Diego address of 836 26nd St, San Diego, CA 92102. At the end of the photos sent by bip\_rickthang, it shows that he created an account and claim under the name of Monieka York with a confirmation number of 35825726. After that, bip\_rickthang asked \_teshae if he knew how to do all of the other states. The photograph in paragraph #29 shows Deautris Mattison with Bobby Ferguson. Paragraph #30 shows the California

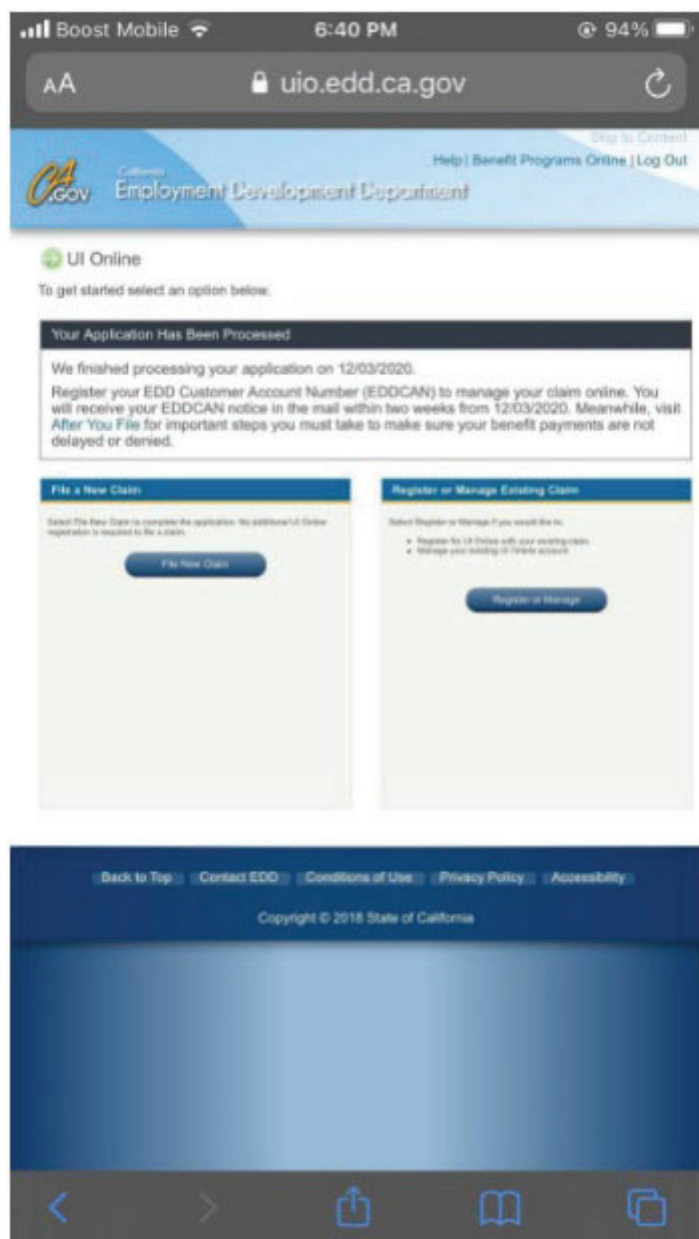
Employment Development Department confirming that a claim under the name of Monieka York has been successfully filed. Paragraph #31 shows a picture from the California Employment Development Department confirming that the application has been successfully processed.



29.



30.



31.

### Keorie Smith ( \_sngyak)

32. In April 2021, Instagram username \_sngyak which is utilized by Keorie Smith 11-16-1996 posted a photograph of himself and another male with a large amount of what appears to be U.S. Currency in the photograph. Agents know that Smith uses this account as agents have compared Smith's photograph in the Instagram account with his WI Dept. of Transportation Driver License photograph. In the comment

section of the photograph, Smith posted a comment “I Ain’t Tryin Click With No Niggas Shit Be Iffy”. After the comment, a shark emoji is posted. Case agents believe this is Keorie Smith identifying himself as a member of the “Shark Gang” criminal organization. Another Instagram user with the username of 10436\_lilmeech, which is utilized by Demetrius J. Exum, posted a shark emoji on the photograph, identifying themselves as members of the “Shark Gang” criminal organization.

33. After a search warrant review of Jalen Williams’ Instagram account (\_axion), Agents observed a conversation between \_axion and \_sngyak. The conversation is in regards unemployment fraud. On 4-28-2021 at 04:58:52 UTC, \_axion sent a message to \_sngyak to “ask edd” (Paragraph # 34). Agents believe that Jalen Williams is referencing the State of California Employment Development Department, in which they are conspiring to commit unemployment fraud. The second conversation (Paragraph 34), Jalen Williams and Keorie Smith are talking about unemployment fraud. \_axion told \_sngyak that he has “I’m bussin hard asl backdating like mf”. Agents believe this to be Jalen Williams telling Keorie Smith that he is busy backdating the unemployment claims to get more money. Keorie Smith then told Jalen Williams that he had been checking status of the claims and that one of the bank debit cards with the unemployment money was sent out two days ago. Jalen Williams then told Keorie Smith to not buy anything you can’t buy three times. Paragraph #35 shows Keorie Smith with a large amount of U.S. Currency. The screen shots are set forth below.



**Author** sngyak (Instagram: 46758519368)

**Sent** 2021-04-24 04:58:52 UTC

**Body** Reacted ❤️ to your message

**Author** \_axion (Instagram: 508275825)

**Sent** 2021-04-28 18:14:30 UTC

**Body** You sent a video.

**Attachments** video-1619633672.mp4 (272042284504221)

**Type** video/mp4

**Size** 2310393

**URL** [https://interncache-eag.fbcdn.net/v/t50.39114-2/176258272\\_292192992517972\\_7521877480874441143\\_n.mp4/video-1619633672.mp4?ccb=1-5&\\_nc\\_sid=060d78&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV92aWRlbyJ9&\\_nc\\_ht=interncache-eag&oh=0d08d49475987adedb7ff768b53c1f1e&oe=61798945&dl=1](https://interncache-eag.fbcdn.net/v/t50.39114-2/176258272_292192992517972_7521877480874441143_n.mp4/video-1619633672.mp4?ccb=1-5&_nc_sid=060d78&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV92aWRlbyJ9&_nc_ht=interncache-eag&oh=0d08d49475987adedb7ff768b53c1f1e&oe=61798945&dl=1)

**Author** \_axion (Instagram: 508275825)

**Sent** 2021-04-28 18:14:43 UTC

**Body** Ask edd

**Author** \_axion (Instagram: 508275825)

**Sent** 2021-04-28 18:28:44 UTC

**Body** You sent a video.

**Attachments** video-1619634526.mp4 (547571069541397)

**Type** video/mp4

**Size** 3876021

34.

**Author** \_\_axion (Instagram: 508275825)

**Sent** 2021-06-19 10:58:55 UTC

**Body** Yo ass yo big gang

**Share** **Date Created** Unknown

**Author** \_sngyak (Instagram: 46758519368)

**Sent** 2021-06-19 11:22:43 UTC

**Body** Been knew

**Author** \_\_axion (Instagram: 508275825)

**Sent** 2021-06-19 11:24:06 UTC

**Body** I'm bussin hard asl backdating like mf

**Author** \_sngyak (Instagram: 46758519368)

**Sent** 2021-06-19 11:26:00 UTC

**Body** I'm steady checkin fa weeks one card sent out 2days ago

**Author** \_\_axion (Instagram: 508275825)

**Sent** 2021-06-19 11:26:30 UTC

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Instagram Business Record

Page 1940

**Body**

Yessirski and bro don't matter what nobody say like I told mike g  
don't buy nun you can't buy three times



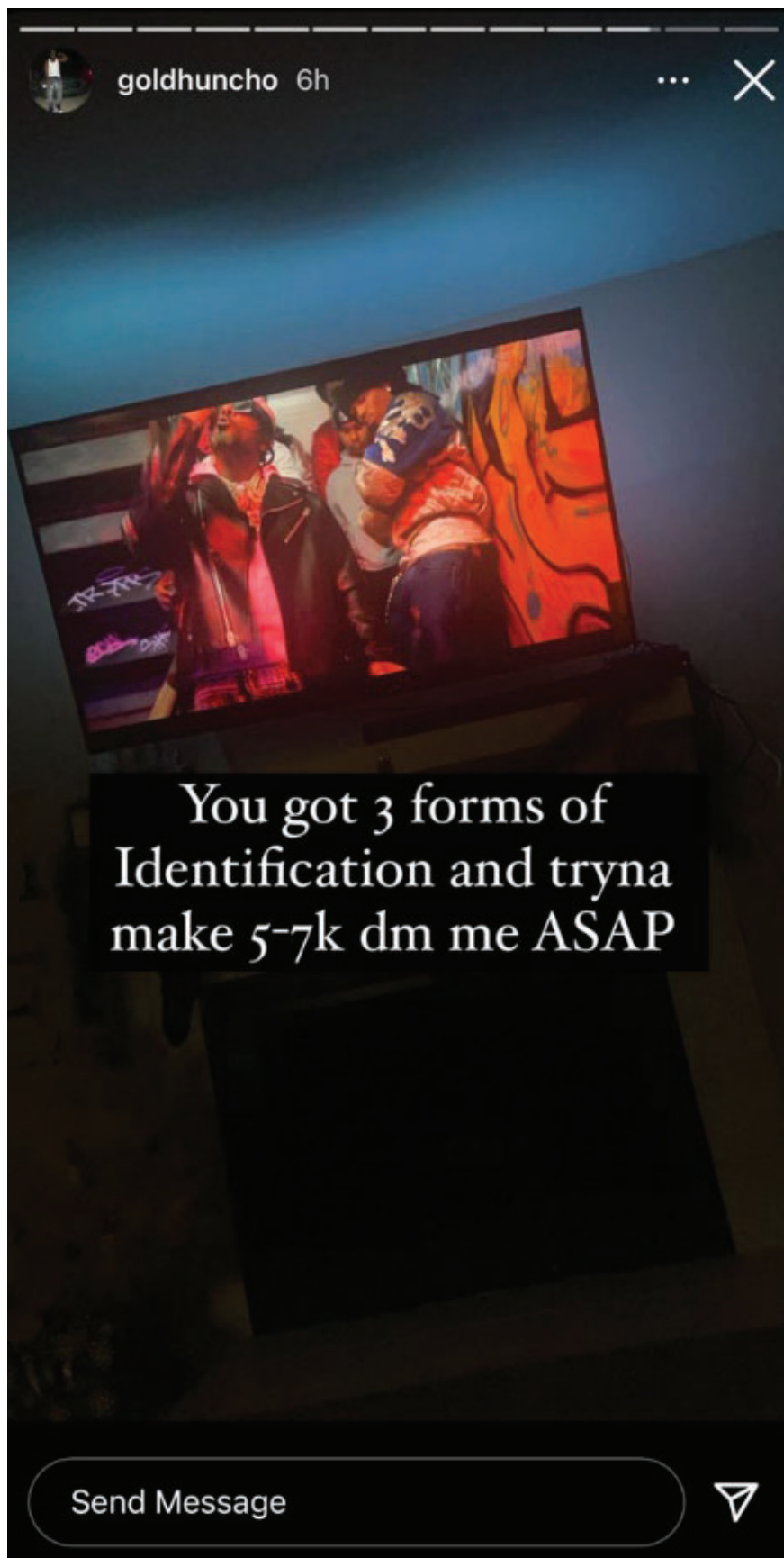
35.



**Chazz D. White (goldhuncho)**

36. In September, 2021 Instagram username goldhuncho which is utilized by Chazz D. White 11-14-1990 posted a photograph of himself. Agents have observed the “selfies” that White posted on the Instagram account and have compared them to the Wisconsin Dept. of Transportation Driver License photo and it is the same person. In the comment section, he posted “U should’ve listen wen i told u I wasn’t regular I’m da real deal u other niggas characters#Imjaws”. Several emojis are listed afterward. See screen shot below. Case agents believe that White is identifying himself as a “Shark Gang” criminal organization member. White also has a shark emoji on his profile page. After a warrant review of Jalen Williams’ Instagram account (\_axion), it reveals a

conversation between \_axion and goldhuncho. This conversation took place on 04-17-2021 at 16:22:19 UTC, goldhuncho asked \_axion what the “ways move” is. \_axion responded by saying “ppp”. Agents know that ppp is being referred to which is short for the Paycheck Protection Program, this program is authorized by the CARES act. Agents also observed a publicly viewable “story” post on White’s Instagram account. This was posted between 01-05-2022 and 01-06-2022. It advertises if you have three forms of identification and are looking to make \$5,000-\$7,000 to direct message him as soon as possible. Paragraph #37 shows goldhuncho posting on his Instagram story a photograph that says you got 3 forms of identification and tryna make 5-7k dm me ASAP. Paragraph #37 also shows the Instagram conversation where goldhuncho asks \_axion what the chime move is. Paragraph #38 shows a picture of Chazz White in a blue sweatshirt.



37.

**Sent**

2021-04-17 16:18:07 UTC

**Body** That's a art museum**Author** goldhuncho (Instagram: 31578210968)**Sent** 2021-04-17 16:21:59 UTC**Body** Ok ima hit chu after I pull up on my pops I think he yo wats**Author** goldhuncho (Instagram: 31578210968)**Sent** 2021-04-17 16:22:04 UTC**Body** Ways**Author** goldhuncho (Instagram: 31578210968)**Sent** 2021-04-17 16:22:19 UTC**Body** Wats da chime move**Author** \_axion (Instagram: 508275825)**Sent** 2021-04-17 16:23:10 UTC**Body** Ppp**Author** goldhuncho (Instagram: 31578210968)**Sent** 2021-04-17 19:14:12 UTC**Body** I don't think Chime workin fo dat lil bro

goldhuncho

Message



135 posts

1,607 followers

3,826 following

Huncho Gold

Real Milwaukee Gangsta Rapper Check me out on YouTube !! Click link in my bio fo new video

[youtu.be/2X9zO3agQqw](https://youtu.be/2X9zO3agQqw)

Followed by reapers\_\_child9, marc0brickz, longliveab0216 +18 more



38.



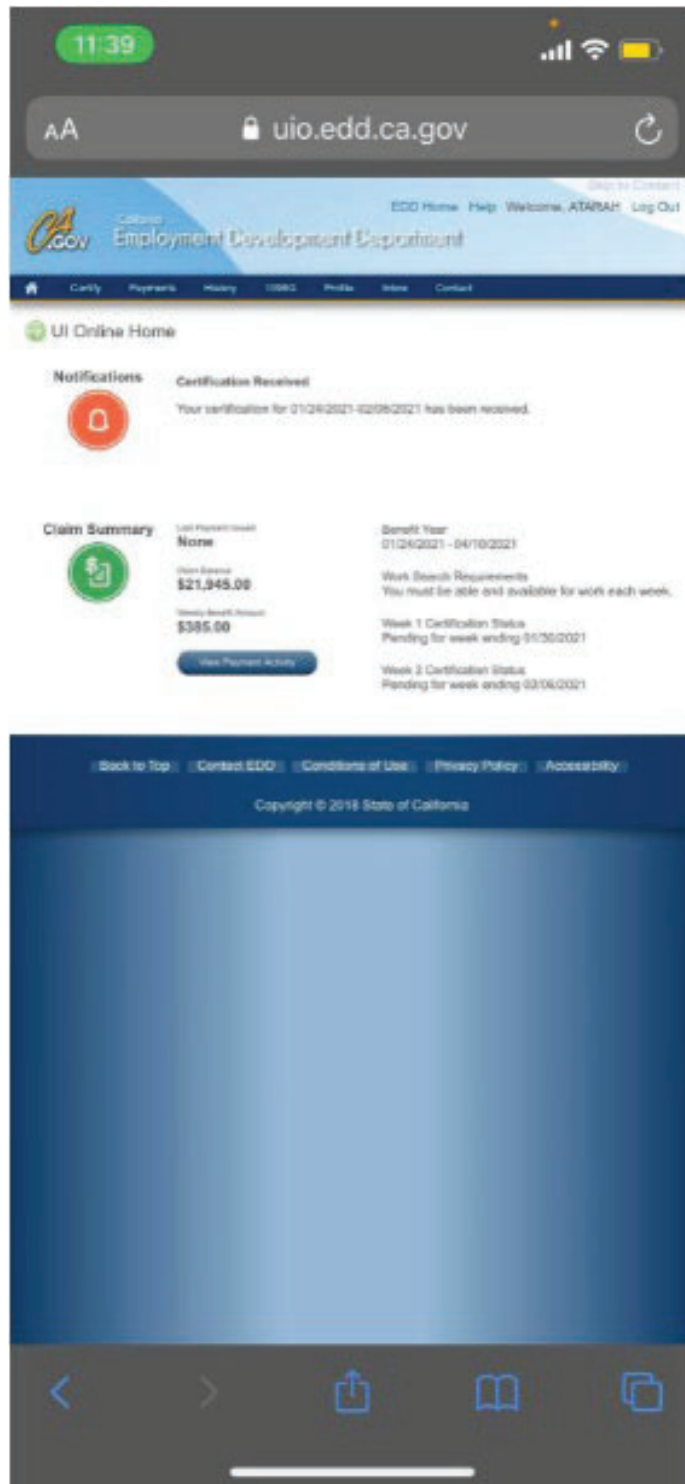
**Quevon J. McKinnie (yay.thebarber)**

39. In September 2021, Instagram username yay.thebarber, which is utilized by Quevon J. McKinnie 04-12-1998 posted a picture of himself holding a dog and what appears to be a pistol with an extended magazine sticking out of his waistband (paragraph 40). Agents have observed the “selfies” that McKinnie has posted and compared them to the Wisconsin Dept. of Transportation Driver License photo and they are the same person. McKinnie is currently a convicted Felon. He was convicted of a felony on 2-22-2018 in Milwaukee County. Case agents believe McKinnie to be a member of the “Shark Gang” criminal organization. In the below photograph, Instagram username marc0brickz which is utilized by Marcus Malbro 09-14-1994, posted fire emoji in the comment section. Additionally, a search warrant review of Teshae Hanna’s cellular telephone revealed conversations between yay.thebarber and

\_teshae. The Instagram conversation shows on 03-03-2021 yay.thebarber posted screen shots of claim summary and history from the State of California Employment Development Department. Agents believe that this activity is evidence of unemployment fraud out of California EDD program. This conversation and activity between yay.thebarber and \_teshae are consistent with other members of the Wild 100's/Shark Gang in their conversations with \_teshae. Paragraph #41 shows the California Employment Development Department claim summary. Paragraph #42 shows the California Employment Development Department claim history.



40.



41.



42.



43. Based upon my training and experience, and knowledge from other agents that have previously executed search warrants from Instagram, Instagram holds records for an extended period of time. According to Instagram, once a user deletes data, it may take up to 90 days for that data to be deleted.<sup>2</sup> But according to an independent security researcher, data was found up to 7 years after it was deleted.<sup>3</sup>

44. Based upon their training, experience, and the investigation to date including the review of numerous other Instagram accounts of known Wild 100's gang members, there is probable cause to believe there may be additional evidence of federal violations of firearm possession, theft of government funds, bank fraud, and wire fraud located within the private portions of the Instagram pages listed above. Case agents are aware based upon their training and experience that individuals often utilize different means of Instagram communication (Instagram messenger) and private Instagram messaging to obtain, transfer, and discuss the use and possession of firearms, and discuss their involvement in a scheme to commit fraud.

45. Based upon their training and experience and the evidence set forth above, case agents believe probable cause exists that the Instagram accounts "10436\_lilmeech", "goldhuncho", "bip\_rickthang", "\_sngyak", "longliveloski4", "marc0brickz" and "yay.thebarber" contain evidence of violations of 18 U.S.C § 922(g)(1) (felon in possession of a firearm), and 18 U.S.C. §§ 371, 641 (theft of government funds), 1343 (wire fraud), and 1343 (bank fraud). Information in this

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<sup>2</sup> <https://help.instagram.com/711062676142607>

<sup>3</sup> <https://www.pcmag.com/news/personal-data-found-on-instagrams-servers-7-years-after-user-deleted-files> In this same article, Instagram claims to have since "fixed" this issue.

account may contain both evidence of these crimes and may also contain evidence that will further the investigation by assisting agents in identifying others involved in the illegal transfer and possession of firearms, theft of government funds, bank fraud, wire fraud, and conspiracy. This Instagram page has been preserved.

#### **BACKGROUND CONCERNING INSTAGRAM<sup>4</sup>**

46. Instagram is a service owned by Meta, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts, like the target account(s) listed in Attachment A, through which users can share messages, multimedia, and other information with other Instagram users and the general public.

47. Meta collects basic contact and personal identifying information from users during the Instagram registration process. This information, which can later be changed by the user, may include the user's full name, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, credit card or bank account number, and other personal identifiers. Meta keeps records of changes made to this information.

48. Meta also collects and retains information about how each user accesses and uses Instagram. This includes information about the Internet Protocol ("IP") addresses used to create and use an account, unique identifiers and other information

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<sup>4</sup> The information in this section is based on information published by Meta on its Instagram website, including, but not limited to, the following webpages: "Data Policy," <https://help.instagram.com/519522125107875>; "Information for Law Enforcement," <https://help.instagram.com/494561080557017>; and "Help Center," <https://help.instagram.com>.

about devices and web browsers used to access an account, and session times and durations.

49. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if “added” to the primary account, can switch between the associated accounts on a device without having to repeatedly log-in and log-out.

50. Instagram users can also connect their Instagram and Facebook accounts to utilize certain cross-platform features, and multiple Instagram accounts can be connected to a single Facebook account. Instagram accounts can also be connected to certain third-party websites and mobile apps for similar functionality. For example, an Instagram user can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a connected Facebook account, or transfer an image from Instagram to a connected image printing service. Meta maintains records of changed Instagram usernames, associated Instagram accounts, and previous and current connections with accounts on Meta and third-party websites and mobile apps.

51. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a “close friends list” for targeting certain communications and activities to a subset of

followers.

52. Users have several ways to search for friends and associates to follow on Instagram, such as by allowing Meta to access the contact lists on their devices to identify which contacts are Instagram users. Meta retains this contact data unless deleted by the user and periodically syncs with the user's devices to capture changes and additions. Users can similarly allow Meta to search an associated Facebook account for friends who are also Instagram users. Users can also manually search for friends or associates.

53. Each Instagram user has a profile page where certain content they create and share ("posts") can be viewed either by the general public or only the user's followers, depending on privacy settings. Users can customize their profile by adding their name, a photo, a short biography ("Bio"), and a website address.

54. One of Instagram's primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or stored on their devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of other users ("tag"), or add a location. These appear as posts on the user's profile. Users can remove posts from their profiles by deleting or archiving them. Archived posts can be reposted because, unlike deleted posts, they remain on Meta's servers.

55. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are tagged in a post by its creator or mentioned in a comment (users can "mention" others by adding their username to a comment followed by "@"). An

Instagram post created by one user may appear on the profiles or feeds of other users depending on a number of factors, including privacy settings and which users were tagged or mentioned.

56. An Instagram “story” is similar to a post but can be viewed by other users for only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and remain on Meta’s servers unless manually deleted. The usernames of those who viewed a story are visible to the story’s creator until 48 hours after the story was posted.

57. Instagram allows users to broadcast live video from their profiles. Viewers can like and add comments to the video while it is live, but the video and any user interactions are removed from Instagram upon completion unless the creator chooses to send the video to IGTV, Instagram’s long-form video app.

58. Instagram Direct, Instagram’s messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, videos, profiles, and other information. Participants to a group conversation can name the group and send invitations to others to join. Instagram users can send individual or group messages with “disappearing” photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can’t view their disappearing messages after they are sent but do have access to each message’s status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.

59. Instagram offers services such as Instagram Checkout and Facebook Pay for users to make purchases, donate money, and conduct other financial transactions

within the Instagram platform as well as on Facebook and other associated websites and apps. Instagram collects and retains payment information, billing records, and transactional and other information when these services are utilized.

60. Instagram has a search function which allows users to search for accounts by username, user activity by location, and user activity by hashtag. Hashtags, which are topical words or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be “followed” to generate related updates from Instagram. Meta retains records of a user’s search history and followed hashtags.

61. Meta collects and retains location information relating to the use of an Instagram account, including user-entered location tags and location information used by Meta to personalize and target advertisements.

62. Meta uses information it gathers from its platforms and other sources about the demographics, interests, actions, and connections of its users to select and personalize ads, offers, and other sponsored content. Meta maintains related records for Instagram users, including information about their perceived ad topic preferences, interactions with ads, and advertising identifiers. This data can provide insights into a user’s identity and activities, and it can also reveal potential sources of additional evidence.

63. In some cases, Instagram users may communicate directly with Meta about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Meta typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well as records of any actions taken by the provider

or user as a result of the communications.

64. For each Instagram user, Meta collects and retains the content and other records described above, sometimes even after it is changed by the user (including usernames, phone numbers, email addresses, full names, privacy settings, email addresses, and profile bios and links).

65. In my training and experience, evidence of who was using Instagram and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. The individuals under investigation frequently post pictures and videos depicting possession of firearms, and fraudulent schemes. This evidence may establish the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion.

66. For example, the stored communications and files connected to an Instagram account may provide direct evidence of the offenses under investigation. Based on my training and experience, instant messages, emails, voicemails, photos, videos, and documents are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation.

67. In addition, the user’s account activity, logs, stored electronic communications, and other data retained by Meta can indicate who has used or controlled the account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, subscriber information, email and messaging logs, documents, and photos and videos



(and the data associated with the foregoing, such as geo-location, date and time) may be evidence of who used or controlled the account at a relevant time. As an example, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

68. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

69. In addition, emails, instant messages, Internet activity, documents, and contact and calendar information can lead to the identification of co-conspirators and instrumentalities of the crimes under investigation.

70. Therefore, Meta's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Instagram. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

## CONCLUSION

71. Based on the forgoing, I request that the Court issue the proposed search warrant.

72. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Meta. Because the warrant will be served on Meta, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

## ATTACHMENT A

### **Property to Be Searched**

This warrant applies to information between July 1, 2020 and February 1, 2022 associated with the following Instagram pages:

- Instagram page under the URL: [https://www.instagram.com/10436\\_lilmeech/](https://www.instagram.com/10436_lilmeech/)
- Username: 10436\_lilmeech
- Instagram Numeric ID: 4237363028
- Instagram page under the URL: <https://www.instagram.com/goldhuncho/>
- Username: goldhuncho
- Instagram Numeric ID: 31578210968
- Instagram page under the URL: [https://www.instagram.com/bip\\_rickthang/](https://www.instagram.com/bip_rickthang/)
- Username: bip\_rickthang
- Instagram Numeric ID: 688962991
- Instagram page under the URL: [https://www.instagram.com/\\_sngyak/](https://www.instagram.com/_sngyak/)
- Username: \_sngyak
- Instagram Numeric ID: 46758519368
- Instagram page under the URL: <https://www.instagram.com/longliveloski4/>
- Username: longliveloski4
- Instagram Numeric ID: 461083634
- Instagram page under the URL: <https://www.instagram.com/marc0brickz/>
- Username: marc0brickz
- Instagram Numeric ID: 9678460696
- Instagram page under the URL: <https://www.instagram.com/yay.thebarber/>

- Username: yay.thebarber
- Instagram Numeric ID: 232906659

that are stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by Instagram**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Meta, Meta is required to disclose the following information to the government for each account or identifier listed in Attachment A:

A. All business records and subscriber information, in any form kept, pertaining to the Account, including:

- a. Identity and contact information (past and current), including full name, e-mail addresses, physical address, date of birth, phone numbers, gender, hometown, occupation, websites, and other personal identifiers;
- b. All Instagram usernames (past and current) and the date and time each username was active, all associated Instagram and Facebook accounts (including those linked by machine cookie), and all records or other information about connections with Facebook, third-party websites, and mobile apps (whether active, expired, or removed);
- c. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;

- d. Devices used to login to or access the account, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;
  - e. All advertising information, including advertising IDs, ad activity, and ad topic preferences;
  - f. Internet Protocol ("IP") addresses used to create, login, and use the account, including associated dates, times, and port numbers, from July 1, 2020 to February 1, 2022;
  - g. Privacy and account settings, including change history; and
  - h. Communications between Meta and any person regarding the account, including contacts with support services and records of actions taken;
- B. All content (whether created, uploaded, or shared by or with the Account), records, and other information relating to videos (including live videos and videos on IGTV), images, stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from July 1, 2020 to February 1, 2022;
- C. All content, records, and other information relating to communications sent from or received by the Account from July 1, 2020 to February 1, 2022, including but not limited to:
- a. The content of all communications sent from or received by the Account, including direct and group messages, and all associated

multimedia and metadata, including deleted and draft content if available;

- b. All records and other information about direct, group, and disappearing messages sent from or received by the Account, including dates and times, methods, sources and destinations (including usernames and account numbers), and status (such as delivered, opened, replayed, screenshot);
- c. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants (including usernames, account numbers, and date and time of entry and exit); and
- d. All associated logs and metadata;

D. All content, records, and other information relating to all other interactions between the Account and other Instagram users from July 1, 2020 to February 1, 2022, including but not limited to:

- a. Interactions by other Instagram users with the Account or its content, including posts, comments, likes, tags, follows (including unfollows, approved and denied follow requests, and blocks and unblocks), shares, invitations, and mentions;
- b. All users the account has followed (including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed,



blocked, unblocked, muted, restricted, or denied a request to follow the account;

c. All contacts and related sync information; and

d. All associated logs and metadata;

E. All records of searches performed by the account from July 1, 2020 to February 1, 2022; and

F. All location information, including location history, login activity, information geotags, and related metadata from July 1, 2020 to February 1, 2022.

Meta is hereby ordered to disclose the above information to the government within 14 DAYS of issuance of this warrant.

## **II. Information to be seized by the government**

1. All information described above that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C §§ 371 (conspiracy), 922(g)(1) (felon in possession of a firearm), and 1343 (wire fraud), those violations involving Demetrius J. Exum, Terry T. Dean, Marcus Malbro, Deautris Q. Mattison, Keorie Smith, Chazz D. White, and Quevon J. McKinnie, and occurring after July 1, 2020, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

a. Possession of a firearm by Demetrius J. Exum and Quevon J. McKinnie; evidence pertaining to schemes to defraud the government by the submission of fraudulent applications for unemployment relief through

the use of the identities of themselves or others including preparatory steps taken, use of the proceeds, and the recruitment of individuals whose identities would be used to further the fraudulent schemes;

- b. Evidence indicating how and when the account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crimes under investigation and to the account owners;
- c. Evidence indicating the account owner's state of mind as it relates to the crimes under investigation;
- d. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- e. The identity of the person(s) who communicated with the user IDs about matters relating to fraudulent schemes to obtain unemployment benefits, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.